

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

FRANK GINAC,

*Plaintiff,*

v.

EDWARD WOLFF & ASSOCIATES LLC,  
CERTA PROPAINERS LTD D/B/A CERTAPRO  
PAINTERS D/B/A CERTAPRO PAINTERS OF  
AUSTIN and JOHN BUNNELL PAINTING LLC,

*Defendant.*

Civil Action No: 1:22-CV-704

**JOINT STIPULATION OF DISMISSAL WITH PREJUDICE**

Plaintiff Frank Ginac (“Plaintiff”), and Defendants Edward Wolff & Associates, LLC, Certa Propainters LTD d/b/a Certapro Painters d/b/a Certapro Painters of Austin, and John Bunnell Painting LLC, (“Defendants”), pursuant to Rule 41 of the of the Federal Rules of Civil Procedure, hereby stipulate to a dismissal of this action with prejudice.

1. There are no longer any issues in this matter between Plaintiff and Defendants to be determined by this Court.
2. Plaintiff and Defendants hereby stipulate that all claims and causes of action that were or could have been asserted against Defendants are hereby dismissed with prejudice, with court costs and attorneys’ fees to be paid by the party incurring the same.
3. This case is not a class action, and a receiver has not been appointed.
4. Pursuant to the terms of Rule 41(a)(1)(A)(ii), this case is dismissed with prejudice with each party to bear its own costs and attorney’s fees, as to Defendants upon filing of this joint stipulation.

Date: December 5, 2023

Respectfully submitted,

**JAFFER & ASSOCIATES, PLLC**

/s/ Shawn Jaffer

**Shawn Jaffer**

Texas Bar No. 24107817

Email: wdtx@jaffer.law

5757 Alpha Road, Suite 580

Dallas, Texas 75240

T: (214) 945-0000

F: (888) 509-3910

**ATTORNEYS FOR PLAINTIFF**

**THOMPSON, COE, COUSINS & IRONS, LLP**

/s/ Jeff D. Otto (with permission)

Jeff D. Otto

Texas Bar No. 15345500

2801 Via Fortuna, Suite 300,

Austin, TX 78746

T: (512) 703-5048

Email: jotto@thompsoncoe.com

**ATTORNEYS FOR DEFENDANTS CERTA**

**PROPAINTERS AND JOHN BUNELL**

**PAINTING**

**MIGNUCCI & GONZALEZ PLLC**

/s/ Braulio E. Gonzalez (with permission)

Braulio E. Gonzalez

14180 N. Dallas Parkway, Suite 714

Dallas, TX 75254

Telephone: (214) 556-8899

Fax: (214) 256-3901

Email: bg@mgtxlaw.com

**ATTORNEYS FOR DEFENDANT EDWARD**

**WOLFF & ASSOCIATES, LLC**

### **CERTIFICATE OF SERVICE**

I hereby certify that on December 5, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties of record in a manner approved by the Federal Rules of Civil Procedure.

/s/ Shawn Jaffer

Counsel for Plaintiff